UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

MPH TECHNOLOGIES OY,
Patent Owner.

Case IPR2019-00821
Patent 8,037,302

EXHIBIT 2002

DECLARATION OF PROFESSOR GEORGE N. ROUSKAS, PH.D.

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TABLE OF CONTENTS

Page

I. INTRODUCTION 1

II. QUALIFICATIONS 1

III. BASES OF OPINIONS 6

IV. APPLICABLE LEGAL STANDARDS 8

A. Ordinary Skill in the Art 8

B. Claim Construction 10

C. Obviousness (35 U.S.C. § 103) 11

V. OVERVIEW OF THE '302 PATENT AND THE STATE OF THE ART AT THE TIME OF THE INVENTION 15

A. Technical Background 16

B. The Mobility Problem Addressed by the '302 Patent 21

C. The '302 Patent's Solution to the Mobility Problem 26

VI. CLAIM CONSTRUCTION 29

A. Secure Connection 30

B. Establishing 32

VII. CLAIMS 1-13 AND 16 ARE PATENTABLE OVER THE COMBINATION OF AHONEN AND ISHIYAMA (GROUND 1) 34

A. Overview of Ahonen 34

B. Overview of Ishiyama 38

C. The Petition Fails to Establish that the Prior Art Teaches "Establishing a Second Secure Connection" that has a First Terminal with a Different, Second Address from the First Address in "Establishing a First Secure Connection" 41

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1. The Petition Fails To Prove That Ahonen Teaches "Establishing A Second Secure Connection Extending Between A Second Network Address Of The First Terminal And The Original Network Address Of The Second Terminal" 42

2. Ahonen's Mobile Host Pre-Creates Security Associations from a Fixed Address 48

D. The Petition Fails to Establish that the Prior Art Teaches the "First Terminal Checking Whether the Second Secure Connection [with the Second Address] Already Exists" 51

E. The Petition Fails to Establish that the Asserted References Teach the "Establishing A First Secure Connection As Being An Active Connection" 56

F. The Petition Fails to Establish that the Prior Art Teaches the Inventions Defined by Dependent Claims 2-13 and 16 61

VIII. CLAIMS 15 AND 16 ARE PATENTABLE OVER THE COMBINATION OF AHONEN, ISHIYAMA AND GUPTA (GROUND 2) **61**

IX. CONCLUSION **62**

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I. INTRODUCTION

1. My name is George Rouskas. I have been retained as an expert witness to provide my independent opinion in regards with matters at issue in the *inter partes* review of U.S. 8,037,302 ("the '302 Patent") in the IPR2019-00821 proceeding. I have been retained by MPH Technologies Oy ("MPH"), the Patent Owner, in the above proceedings. Petitioner in this case is Apple Inc. ("Apple").

2. Unless otherwise noted, the statements made herein are based on my personal knowledge, and if called to testify about this declaration, I could and would do so competently and truthfully.

3. A detailed record of my professional qualifications including cases in which I was an expert is being submitted herewith as Exhibit 2003 and is summarized in Section II, *infra*.

4. I am not a legal expert and offer no opinions on the law. However, I have been informed by counsel of the various legal standards that apply, and I have applied those standards in arriving at my conclusions.

II. QUALIFICATIONS

5. I am an Alumni Distinguished Graduate Professor with Tenure in the Department of Computer Science at North Carolina State University (NC State), where I also serve as the Director of Graduate Programs. I am an experienced researcher and educator in the field of computer networking, with expertise in

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Internet architectures and protocols, virtualization and cloud computing, mobile devices, network devices, network security and security protocols, in a variety of applications including providing for the protection of information transmitted between devices within and among networks.

6. I have thirty years of experience in computer networking since I received my bachelor's degree in 1989. I have twenty-five years of experience as a professor in the Department of Computer Science of NC State.

7. During this time, I have led, overseen, and contributed to numerous research projects involving technical concepts that are related to the technology at issue in the IPR2019-00821 proceeding, which relates to the issue of providing mobility to secure connections over networks, such as where a first computer device in secure communication with a second computer device changes its location from a first address to a second address. For example, as part of our NSF-funded ChoiceNet project, my research group developed a new Internet architecture, a suite of communication protocols, and a proof-of-concept prototype implementation to enable real-time economic transactions in the network layer, including secure payments. For an earlier NSA-funded Jumpstart project, my group developed a novel signaling architecture and protocol for high-speed networks and designed relevant security mechanisms.

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